

1 **SAO**  
2 MICHAELA E. WOOD, ESQ.  
3 Nevada Bar No. 9466  
4 **RICHARD HARRIS LAW FIRM**  
5 801 South Fourth Street  
6 Las Vegas, Nevada 89101  
7 Phone: (702) 444-4444  
8 Fax: (702) 444-4455  
9 E-Mail: [Michaela@RichardHarrisLaw.com](mailto:Michaela@RichardHarrisLaw.com)  
10 *Attorneys for Plaintiff*

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

11 SANDRA DE BLANC, )  
12 )  
13 Plaintiff, )  
14 ) CASE NO.: 2:18-cv-00151-APG-CWH  
15 vs. )  
16 )  
17 ALOHA AIRPORT EXPRESS, a Foreign Limited )  
18 Liability Company; does 1 THROUGH 20; ROE )  
19 BUSINESS ENTITIES 1 through 20, inclusive )  
20 jointly and severally, )  
21 )  
22 Defendants. )  
23 )

24 **STIPULATION AND ORDER FOR EXTENSION OF TIME**  
25 **TO COMPLETE DISCOVERY (FIRST REQUEST)**

26 The parties stipulate to an extension of discovery deadlines, currently set pursuant to the  
27 Stipulated Discovery Plan and Scheduling Order [Doc. #10] filed on March 7, 2018.

28 **I. DISCOVERY THAT HAS BEEN COMPLETED IN THIS MATTER INCLUDES THE FOLLOWING:**

The following discovery has been completed by the parties:

1. Plaintiff received written discovery;
2. Plaintiff's Initial Disclosure;

3. Defendant's Initial 16.1 Disclosure.

**II. DISCOVERY THAT REMAINS TO BE COMPLETED:**

The discovery that remains to be completed includes, but is not limited to:

1. Initial expert disclosures;
2. Depositions of expert witnesses
3. Deposition of Person(s) Most Knowledgeable for Aloha Airport Express;
4. Deposition of Plaintiff;
5. Depositions of Plaintiff's treating providers;
6. Additional written discovery requests.
7. Requesting and obtaining updated medical records.
8. Any other potential depositions or written discovery which may become necessary as discovery continues.

**III. REASONS WHY THE DISCOVERY REMAINING WILL NOT BE COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER**

The parties to this action need additional time to complete discovery. The Plaintiff lives out of state and takes care of her elderly, sick husband. She has to make arrangements for somebody to stay with him while she travels back to Las Vegas for her deposition. Defense counsel has been kind enough to accommodate for this and has agreed to extend any outstanding deadlines.

**IV. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY**

The parties hereby stipulate to continue the discovery deadlines **sixty (60)** days as follows:

	<b>Old Deadline:</b>	<b>New Deadline:</b>
Last day to Amend Pleadings:	04/26/2018	06/25/2018
Initial Expert Disclosures:	05/25/2018	07/24/2018

Interim Status Report	05/25/2018	07/24/2018
Rebuttal Expert Disclosures:	06/25/2018	08/24/2018
Close of Discovery:	07/25/2018	09/24/2018
Dispositive Motion Deadline:	08/24/2018	10/23/2018
Pre-Trial Order, if no Dispositive Motions	09/24/2018	11/23/2018

Dated this 27<sup>th</sup> day of April, 2018

By: /s/ Michaela E. Wood

**RICHARD HARRIS LAW FIRM**  
Michaela E. Wood, Esq.  
Nevada Bar No. 9466  
801 S. Fourth Street  
Las Vegas, NV 89101

*Attorneys for Plaintiff*

Dated this 27<sup>th</sup> day of April, 2018

By: /s/ Christopher D. Phipps

**WILSON ELSEER MOSKOWITZ  
& DICKER LLP**  
Christopher D. Phipps, Esq.  
Nevada Bar No. 3788  
300 S. Fourth Street, 11<sup>th</sup> Floor  
Las Vegas, NV 89101

*Attorneys for Defendant*

IT IS SO ORDERED

DATED: May 1, 2018

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5, I certify that I am an employee of RICHARD HARRIS LAW FIRM, and that on this 27<sup>th</sup> day of April, 2018, I served a copy of the foregoing **STIPULATION AND ORDER FOR EXTENSION OF TIME TO COMPLETE DISCOVERY** by the CM/ECF electronic filing system of the United States District Court for the District of Nevada, upon each party in this case who is registered as an electronic filing user with the Clerk.

WILSON ELSEER MOSKOWITZ  
& DICKER LLP  
Christopher D. Phipps, Esq.  
Nevada Bar No. 3788  
300 S. Fourth Street, 11<sup>th</sup> Floor  
Las Vegas, NV 89101  
Attorneys for Defendant

/s/ Nicole Gilenson

\_\_\_\_\_  
An Employee of Richard Harris Law Firm